



## City of Seattle

Paul Schell, Mayor

Seattle Public Utilities  
Diana Gale, Director

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September 4, 2001

Seattle Public Utilities  
Dexter Horton Building, 10<sup>th</sup> Floor  
710 Second Avenue  
Seattle, Washington 98104

Lou Driessen, Project Manager  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

**SUBJECT: Comments for the Draft Environmental Impact Statement (DEIS) for the Kangley-Echo Lake Transmission Project**

Sent via e-mail to: [comment@bpa.gov](mailto:comment@bpa.gov)

Dear Mr. Driessen:

Seattle Public Utilities (SPU) is responsible for providing drinking water to 1.3 million customers in the urbanized areas of western King County and southern portion of Snohomish County. SPU takes approximately two-thirds of its drinking water from the Cedar River. SPU owns the 90,546-acre Cedar River Municipal Watershed (CRW) and manages its land and aquatic resources for water supply, the protection and restoration of fish and wildlife habitat, and the protection of cultural resources. SPU's companion utility, Seattle City Light, owns and operates a hydroelectric facility and associated transmission lines in the watershed. City Light will provide comments on the DEIS under separate cover.

This letter provides Seattle Public Utilities' (SPU) comments on the Draft EIS for the Kangley-Echo Lake Transmission Project. SPU provided comments during the scoping for this project in letters to BPA dated April 28 and October 2, 2000. Because the DEIS fails to address SPU's scoping comments, these are repeated in the appropriate sections of this letter. All of SPU's comments should be understood in the proper context: the CRW is a unique and vital resource for the citizens of Seattle and the region. This area is currently being managed to protect a safe, unfiltered source of drinking water and to protect numerous wildlife species and their habitat.

SPU considers this DEIS to be inadequate because it: 1) contains significant NEPA-procedural deficiencies, including what appears to be a lack of full-disclosure of environmental impacts; 2) fails to include important Endangered Species Act (ESA)-related analysis, coordination, and mitigation; 3) lacks commitments to compensatory mitigation; 4) fails to acknowledge the unique long-term habitat protection status provided by the HCP and to recognize the increasing regional biodiversity value of the habitats it proposes to impact; and 5) fails to appropriately acknowledge the significance of the CRW as the water

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*We are the source: Setting the standard for excellence in watershed stewardship*

Watershed Management Division, 19901 Cedar Falls Rd. S.E., North Bend, WA, 98045  
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supply for 1.3 million people. We request that BPA issue a Supplemental DEIS (along with the associated public comment period) that corrects these serious flaws, clearly and accurately assesses the true environmental impacts of this project, and is compliant with NEPA regulations and guidance.

SPU has the following comments on the DEIS. Five separate attachments to this cover letter are included in this submittal. The first attachment contains general comments on the DEIS followed by specific comments on the DEIS. Each of the subsequent four attachments provide comments on each of the four BPA DEIS technical appendices (A, Fisheries; B, Wildlife; C, Vegetation; and D, Wetlands). Because the DEIS is largely a distillation of its technical appendices, SPU's comments on the technical appendices will also apply to the DEIS. In addition, there is much boilerplated text used in the DEIS and its appendices. To minimize redundancy, SPU has attempted to comment only once in such cases, but those comments would apply to other documents for which the comments are relevant.

If you have questions or require further information, please contact Jim Erckmann at (206) 233-1512 or Clay Antieau at (206) 233-3711. Regarding cultural resources, please contact SPU's staff archaeologist, Tom Minichillo at (206) 233-0032.

Sincerely,

SIGNATURE

Suzanne Flagor  
Director  
Watershed Management Division  
Seattle Public Utilities

Attachments:

- 1) SPU comments on BPA DEIS
- 2) SPU comments on BPA DEIS Appendix A (Fisheries)
- 3) SPU comments on BPA DEIS Appendix B (Wildlife)
- 4) SPU comments on BPA DEIS Appendix C (Vegetation)
- 5) SPU comments on BPA DEIS Appendix D (Wetlands)

cc: Dennis Anderson, Muckleshoot Indian Tribe  
Maria Cantwell, U.S. Senate  
Craig Hansen, USFWS  
Hardev Juj, Seattle City Light  
Steve Landino, NMFS  
Patty Murray, U.S. Senate  
Seattle Mayor Paul Schell  
King County Executive Ron Sims  
Val Varney, EPA